

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GUADA TECHNOLOGIES LLC,

Plaintiff,

v.

MUNCHKIN, INC.,

Defendant.

C.A. No. 19-cv-2051-RGA

JURY TRIAL DEMANDED

PATENT CASE

ANSWER TO COUNTERCLAIMS OF MUNCHKIN, INC.

Plaintiff Guada Technologies LLC hereby answers the counterclaims (D.I. 11) of Munchkin, Inc. (“Defendant”), by corresponding paragraph number as follows:

PARTIES

1. Guada Technologies admits that Defendant is a Delaware corporation. Guada Technologies is without knowledge or information sufficient to form a belief as to the remaining allegations and therefore denies all other allegations.

2. Admitted.

JURISDICTION AND VENUE

3. Guada Technologies incorporates by reference its responses to paragraphs 1 through 2 above, as if fully set forth herein.

4. Admitted.

5. Guada Technologies admits that Court may exercise personal jurisdiction over Guada for the Counterclaims because Guada has subjected itself to the jurisdiction of the Court for the Counterclaims by commencing this action against Munchkin. Guada Technologies admits that, as a result of commencing the action against Munchkin, it would be reasonable for this Court to exercise jurisdiction over Guada Technologies for the Counterclaims that arise out

of and/or relate to Guada's allegations against Munchkin in this action. Guada Technologies denies all other allegations in the paragraph.

6. Guada Technologies admits that venue is proper in this District for Defendant's counterclaims because Guada Technologies filed its complaint in this District. Guada Technologies denies all other allegations in the paragraph.

DEFENDANT'S COUNT I (Non-Infringement of U.S. Patent No. 7,231,379)

7. Guada Technologies incorporates by reference its responses to paragraphs 1 through 6 above, as if fully set forth herein.

8. Admitted.

9. Admitted.

10. Denied.

DEFENDANT'S COUNT II (Invalidity of U.S. Patent No. 7,231,379)

11. Guada Technologies incorporates by reference paragraphs 1 through 10 above, as if fully set forth herein.

12. Admitted.

13. Admitted.

14. Denied.

15. Denied.

16. Denied.

DEFENDANT'S PRAYER FOR RELIEF

Guada Technologies denies that Defendant is entitled to any relief, including the relief requested in its Prayer for Relief.

DEFENDANT'S DEMAND FOR JURY TRIAL

Defendant's jury demand is an averment to which no response is required.

March 20, 2020

Respectfully Submitted,

STAMOULIS & WEINBLATT LLC

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Guada Technologies LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2020, I electronically filed the above documents with the Clerk of Court using CM/ECF which will send electronic notification of such filings to all registered counsel.

/s/ Stamatios Stamoulis
Stamatios Stamoulis (No. 4606)